

DECLARATION

SITE NAME AND LOCATION

Operable Unit 2B, Sites 2 and 17
Marine Corps Air Station El Toro
Santa Ana, California 92709

STATEMENT OF BASIS AND PURPOSE

This interim Record of Decision presents the selected remedial action for vadose zone soil at Site 2 and for vadose zone soil and groundwater at Site 17 at Marine Corps Air Station (MCAS) El Toro, located in Orange County, California. Remediation of groundwater at Site 2 will be addressed in the final Record of Decision. In addition, a radiological investigation is planned for Sites 2 and 17. The final Record of Decision will contain an evaluation of the potential impact of the results of the investigation on the remedies for Sites 2 and 17 and will present any modifications to the remedy that are required as a result. Sites 2 and 17 are inactive landfill sites located at Marine Corps Air Station El Toro in Orange County, California. This document was developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986, 42 *United States Code* Section 9602 et seq., the National Oil and Hazardous Substances Pollution Contingency Plan, and Executive Order 12580. This decision is based on the administrative record file for these sites.

The state of California (through the California Environmental Protection Agency, Department of Toxic Substances Control and Santa Ana Regional Water Quality Control Board) and the United States Environmental Protection Agency concur with the selected remedy.

ASSESSMENT OF THE SITE

Actual or threatened releases of hazardous substances from these sites, if not addressed by implementing the response action selected in this Record of Decision, may present a current or potential threat to public health and welfare or the environment.

DESCRIPTION OF THE REMEDY

The selected remedy for remediation of Sites 2 and 17 to be completed by the Department of the Navy includes the following components.

- A single-layer, minimum 4-foot monolithic soil cap will be used to prevent contact with landfill materials and to reduce infiltration into landfill contents.
- On-site waste consolidation will occur prior to capping at Sites 2 and 17.
- Erosion control features will be used to control surface-water flow and protect the integrity of the cap.

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- Fencing, signs, and gates with locks will be used to restrict access to the sites.
 - Land-use restrictions will be used to protect the landfill cap, restrict irrigation, prevent use of groundwater at Site 2, assure that contact with landfill materials does not occur, and allow the Department of the Navy (DON), the Federal Facility Agreement signatories, and the California Integrated Waste Management Board and/or its local enforcement agency access to the sites for the purpose of conducting or overseeing monitoring and maintenance.
 - Natural resource/habitat mitigation measures will be coordinated with the U.S. Fish and Wildlife Service.
 - Monitoring of soil gas and leachate will be performed to detect any migration of contaminants from the landfills. The monitoring devices will be secured to prevent damage.
 - Groundwater will be monitored at Sites 2 and 17 to detect any releases of contaminants from the landfills. Monitoring wells will be secured to prevent damage.
 - The cap, drainage features, settlement monuments, and security features will be inspected and maintenance will be performed as necessary to assure the integrity of the landfill cap and prevent unauthorized access.
 - Periodic reviews (at least every 5 years) will be conducted to evaluate the monitoring results and verify that the action remains protective of human health and the environment.

At this time, based on available data, the DON concludes that groundwater at Site 17 does not require remediation. The remedy for groundwater at Site 2 is not addressed in this Record of Decision. The remedial action for groundwater at Site 2 will be selected in the final Record of Decision.

These components of the selected remedy are derived from the United States Environmental Protection Agency presumptive remedy for municipal and military landfills. The basic premise of the landfill presumptive remedy is containment of landfill wastes and contaminants derived from those wastes found in the air, soil, and groundwater.

The DON has decided to perform a radiological survey of Sites 2 and 17. Based on survey results, radiological sampling may also be required. The DON intends to start remedial design of the landfill cap for Sites 2 and 17 prior to completion of the radiological survey. However, remedial action (e.g., construction of the landfill cap) will not take place until the survey/sampling is complete and the data have been evaluated to determine potential impact on the remedial design. Should the evaluation show that the selected remedy needs to be modified to address radiological contamination, the modification will be presented in the final Record of Decision.

Declaration

STATUTORY DETERMINATIONS

The selected remedy is protective of human health and the environment, complies with substantive federal and state requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost-effective. The selected landfill remedy uses permanent solutions and alternative remediation technologies to the maximum extent practicable. However, because treatment of the principal threats at the landfill site was not found to be practicable, this remedy does not satisfy the statutory preference for treatment as a principal element of the remedy. The heterogeneity and volume of buried wastes and the fact that there are no on-site hot spots that represent the major sources of contamination preclude a remedy in which contaminants could be excavated and treated effectively. Subsequent actions are planned to fully address the threats posed by contaminated groundwater at Site 2.

Because this remedy will result in landfill wastes remaining on-site, reviews will be conducted at least every 5 years (more frequently if deemed necessary) after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment. Because this is an interim Record of Decision, review of this site and remedy will be ongoing as the DON continues to develop the final remedial alternative for groundwater at Site 2 and to evaluate the impact of the results of the radiological investigation on the selected remedy.

Signature: _____

Mr. Dean Gould
Base Realignment and Closure Environmental Coordinator
Marine Corps Air Station El Toro

Date: _____

4/13/00

Signature: _____

Mr. John E. Scandura, Chief
Southern California Operations
Office of Military Facilities
Department of Toxic Substances Control

Date: _____

6/27/00

Signature: _____

Daniel A. Meer, Chief
Federal Facilities Cleanup Branch
United States Environmental Protection Agency, Region IX

Date: _____

7/12/00

Signature: _____

Mr. Gerard Thibeault
Executive Officer
Regional Water Quality Control Board, Santa Ana Region

Date: _____

7/10/00

